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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ROBERT BOSCH HEALTHCARE
SYSTEMS, INC.,) CASE NO. 3:14-cv-01575-EMC
Plaintiff,)
v.) JOINT STIPULATION TO EXTEND
CARDIOCOM LLC,) TIME TO RESPOND TO MOTION TO
Defendant.) LIFT STAY AND CONTINUE
) HEARING DATE FOR MOTION AND
) CASE MANAGEMENT CONFERENCE

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Robert Bosch Healthcare Systems, Inc. ("Bosch") and Defendant Cardiocom, LLC ("Cardiocom") hereby submit this Joint Stipulation to Extend Time to Respond to Motion to Lift Stay and Continue Hearing Date for Motion and Case Management Conference. The parties stipulate that Cardiocom's response brief to Bosch's Motion to Lift Stay (Dkt. 171) may be extended from January 12, 2017 to January 19, 2017. As the motion was filed during the holidays, Cardiocom requested, and Bosch granted, an additional week to allow a full and proper response.

The hearings for Bosch's Motion to Lift Stay and the Case Management Conference are currently scheduled for February 2, 2017 at 1:30. (Dkts. 171 and 173.) The parties stipulate and request that the Court continue the Case Management Conference to February 23, 2017 in order to accommodate a prior conflict of Cardiocom's lead Counsel, Daniel McDonald of the Merchant & Gould firm.

The requested continuance shall not otherwise affect scheduling issues for the case. No previous extension of this deadline has been requested or granted.

IT IS SO STIPULATED, through counsel of record:

DATED: January 6, 2017

/s/ Bas de Blank

Counsel for Plaintiff Robert Bosch Healthcare Systems, Inc.

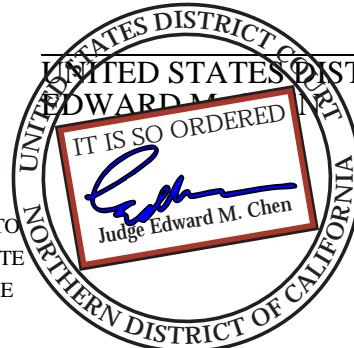
DATED: January 6, 2017

/s/ Adam Alper

Counsel for Defendant Cardiocom, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED that Cardiocom, LLC shall have until January 19, 2017 to file an opposition to Bosch's Motion to Lift Stay (Dkt. 171) and the hearings for that motion and the Case Management Conference are continued to February 23, 2017.

Dated: 1/9/17



CASE NO. 3:14-cv-01575-EMC

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO
MOTION TO LIFT STAY AND CONTINUE HEARING DATE
FOR MOTION AND CASE MANAGEMENT CONFERENCE

1 **DECLARATION OF WILLIAM SCHULTZ**
2 **IN SUPPORT OF JOINT STIPULATION TO EXTEND TIME TO RESPOND TO MOTION**
3 **TO LIFT STAY AND CONTINUE HEARING DATE FOR MOTION AND CASE**
4 **MANAGEMENT CONFERENCE**

5 1. I am an attorney for Cardiocom, LLC in this matter. The statements made herein are
6 based on my personal knowledge and on information made available to me in the course of my
7 duties and responsibilities for Cardiocom, LLC.

8 2. I spoke with Bas de Blank, counsel for Bosch, Inc. on December 30, 2016, January 5,
9 2017, and January 6, 2017 regarding Bosch's Motion to Lift Stay and the upcoming hearings for that
10 motion and the Case Management Conference, both of which are currently scheduled for February 2,
11 2017. I requested that Bosch agree to extend Cardiocom's deadline to respond to Bosch's motion by
12 a week because the motion coincided with the holidays and to allow Cardiocom to fully respond to
13 the motion. Bosch's counsel agreed to the short extension of time, which would make Cardiocom's
14 response due on January 19, 2017.

15 3. I also raised an issue that Cardiocom's counsel had a previous conflict the hearings
16 scheduled on February 2, 2017 regarding Bosch's motion and the Case Management Conference. I
17 requested that Bosch agree to move the hearing to February 9, 2017. Bosch's counsel was not
18 available on February 9 based on a prior commitment outside of the country, but agreed February 23,
19 2017 would work.

20 4. The requested continuance shall not otherwise affect scheduling issues for the case.

21 5. Cardiocom has not previously requested an extension to respond to Bosch's Motion
22 to Lift Stay or move the current hearing dates that are scheduled for February 22, 2017.
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1 I declare under penalty of perjury under the laws of the United States of America that the foregoing
2 is true and correct. Executed on January 6, 2017 at Minneapolis, MN.
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/s/ William Schultz
William Schultz

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1 **ATTESTATION OF CONCURRENCE IN FILING**
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I Adam Alper, am the ECF User whose identification and password are being used to file this
Joint Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Bas De Blank of
Orrick, Herrington & Sutcliffe LLP has concurred in this filing.

7 DATED: January 6, 2017

/s/ Adam Alper

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on January 6, 2017, a copy of the foregoing document is being
3 electronically filed with the Clerk of the United States District Court for the Northern District of
4 California by using the CM/ECF system, which will send notice of such filing to all counsel of
5 record.

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7 /s/Adam Alper _____

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